

## ***REMARKS***

### **1. Present Status of Patent Application**

This is a full and timely response to the outstanding non-final Office Action of June 23, 2010. Claims 1, 5, 8-10, 17, 19, 21-24, and 31 have been amended and claims 3, 13, and 27 have been canceled without prejudice, waiver, or disclaimer. No new matter is introduced with these amendments. In the present response, claims 1, 5-11, 14, 16-19, 21-25, and 29-32 remain pending in the present application. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

### **2. Telephone Interview**

The Examiner is encouraged to contact Assignee's attorney, after reviewing the present response, to resolve or discuss any questions or outstanding issues in an effort to expedite examination of the present application.

### **3. Response to Rejections of Claims under 35 U.S.C. §103**

Claims 1, 3, 5-11, 13-14, 16-19, 21-22, 24-25, 27, and 29-32 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over *Persels* (U.S. Patent No. 7,065,547) in view of *Hashem* (U.S. Patent No. 7,155,578). Claim 23 has been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over *Persels* in view of *Hashem* in further view of *Campbell* (U.S. Patent Publication No. 2005/0086298).

#### **a. Claim 1**

Independent claim 1 recites:

A file handling system, comprising:

a terminating file transfer computer having a processor, the terminating file computer operable to receive a file transfer message from an originating file transfer computer along with at least one file, the file transfer message including details about the transfer of the at least one file including a user and at least one filename for the at least one file, the terminating file transfer computer in response to receiving the file transfer message, executing an agent;

the agent operable to read the file transfer message received from

the originating file transfer computer, and direct the transfer of the at least one filename and the at least one file associated with the at least one filename to a home directory of the terminating file transfer computer, the home directory associated with the user in accordance with instructions from a configuration file residing in the home directory; and

*the configuration file residing in the home directory, and operable to instruct the agent, after saving the at least one file to the home directory, to transfer the at least one file from the home directory to a remote terminal computer of the user specified in the configuration file, wherein the configuration file comprises a host name and a port name of the remote terminal computer thereby allowing transfer of the at least one file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer.*

(Emphasis added).

Independent claim 1 is allowable for at least the reason that Persels in view of Hashem does not disclose, teach, or suggest at least "the configuration file residing in the home directory, and operable to instruct the agent, after saving the at least one file to the home directory, to transfer the at least one file from the home directory to a remote terminal computer of the user specified in the configuration file, wherein the configuration file comprises a host name and a port name of the remote terminal computer thereby allowing transfer of the at least one file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer," as emphasized above.

The Office Action contends that Persels discloses "a configuration file residing in the home directory of the terminating file transfer computer, (Persels-Column 7 Lines 10-20, 'administrative [data] pertaining to iBox') and operable to instruct an agent to, after saving the at least one file to the home directory, (Persels-Column 6 Lines 15-20, 'the message is retained in the eFORWARD server database') transfer said at least one file to a remote host." Page 7 (Emphasis removed).

In response, Assignee notes that an eDIRECT client may request a receive session with an eFORWARD server. "While establishing a valid session with the eFORWARD Server<sup>SM</sup> 12, eDIRECT™ may request a receive session in one of three modes: 1) Receive a single message, 2) Receive in Single Batch mode and discontinue the session, and 3) Receive in Batch mode and request server call back (eDIRECT

stays in listening mode). In each case, eDIRECT™ may request that messages from all transmitting iBoxes<sup>SM</sup> (a.k.a., trading partners) addressed to a specific iBox<sup>SM</sup> be delivered or that messages only from a single specified trading partner be delivered." Col. 6, lines 34-43. "If a batch receive with server call back is requested then all waiting messages will be transmitted by the Server in order of their receipt and the eDIRECT IP address and call back port is recorded for instant delivery when/if subsequent message arrive for the specified iBox. The call back request must be refreshed every 'n' minutes or the server will discontinue honoring the call back request." Col. 6, lines 50-56.

As such, the *Persels* reference fails to disclose "the configuration file residing in the home directory, and operable to instruct the agent, after saving the at least one file to the home directory, to transfer the at least one file from the home directory to a remote terminal computer of the user specified in the configuration file, wherein the configuration file comprises a host name and a port name of the remote terminal computer thereby allowing transfer of the at least one file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer," as recited in claim 1. In contrast, *Persels* discloses that the eFORWARD server receives instructions from a receiving eDIRECT client to transmit to the eDIRECT client a waiting message intended for the receiving eDIRECT client. At the time of receiving the request from the eDIRECT client, the eDIRECT IP address and call back port is recorded for the eDIRECT IP client. These instructions and information do not reside in a configuration file residing in a home directory, as described in claim 1.

Further, the Office Action contends that *Hashem* discloses "allowing transfer of said at least one file to the remote computer without necessitating the remote computer being logged on the terminating file transfer computer." See page 8. This should be considered in the context that the remote terminal computer interacts with a terminating file transfer computer which interacts with an originating file transfer computer, as described in claim 1. Particularly, the originating file transfer computer transfers a file to the terminating file transfer computer which transfers the file to the remote terminal computer.

The Office Action states that *Hashem* automatically downloads a file to a destination user without requiring the destination user to login to the terminal file computer. See pages 8-9 of Office Action and col. 5, lines 25-55 of *Hashem*. In response, Assignee respectfully submits that *Hashem* is describing the transfer of a file to a “terminating file transfer computer” and not “a remote terminal computer.” The file being transferred is sent from an originating site or computer to a terminating site or computer, whereas the claim is reciting transfer of a file from a home directory of a terminating file transfer computer (which received the file from an originating file transfer computer) to a remote terminal computer of the user. Thus, this passage of *Hashem* fails to disclose or describe that a file is downloaded to a destination user, as suggested in the Office Action. For example, *Hashem* does not disclose the further act of transferring the file from either an internal inbox 52 or external inbox 87 to a destination user.

Therefore, *Hashem* fails to remedy the deficiencies of *Persels*. For at least the foregoing reasons, the proposed combination of *Persels* in view of *Hashem* fails to teach or suggest at least “the configuration file residing in the home directory, and operable to instruct the agent, after saving the at least one file to the home directory, to transfer the at least one file from the home directory to a remote terminal computer of the user specified in the configuration file, wherein the configuration file comprises a host name and a port name of the remote terminal computer thereby allowing transfer of the at least one file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer,” as recited in claim 1. Accordingly, claim 1 is patentable over *Persels* in view of *Hashem*, and the rejection of claim 1 should be withdrawn.

b. Claims 3 and 5-9

For at least the reasons given above, claim 1 is allowable over the cited art of record. Since claims 5-9 depend from and include the features of claim 1 and recite additional features, claims 5-9 are allowable as a matter of law over the cited art of record.

Claim 3 is canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to the claim is rendered moot. Assignee takes this action merely to reduce the

number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Assignee reserves the right to pursue the subject matter of the canceled claim in a continuing application, if Assignee so chooses, and does not intend to dedicate any of the canceled subject matter to the public.

c. Claim 10

Independent claim 10 recites:

A method of handling files on a computer, comprising:  
receiving a file transfer message from an originating file transfer computer at a terminating file transfer computer;

in response to receiving the file transfer message, executing an agent;

determining, by the agent, a home directory of the terminating file transfer computer from a user associated with the file transfer message;  
storing at least one file associated with the file transfer message in the home directory;

*retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote terminal computer of the user, the configuration file instructing the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file; and*

*transmitting, via the agent, the at least one file responsive to the configuration file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer.*

(Emphasis added).

Independent claim 10 is allowable for at least the reason that *Persels* in view of *Hashem* does not disclose, teach, or suggest at least "retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote terminal computer of the user, the configuration file instructing the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file; and transmitting, via the agent, the at least one file responsive to the configuration file to the remote terminal computer without

necessitating the remote terminal computer being logged on the terminating file transfer computer," as emphasized above.

The Office Action contends that *Persels* discloses "a configuration file residing in the home directory of the terminating file transfer computer, (Persels-Column 7 Lines 10-20, 'administrative [data] pertaining to iBox') and operable to instruct an agent to, after saving the at least one file to the home directory, (Persels-Column 6 Lines 15-20, 'the message is retained in the eFORWARD server database') transfer said at least one file to a remote host." Page 7 (Emphasis removed).

In response, Assignee notes that an eDIRECT client may request a receive session with an eFORWARD server. "While establishing a valid session with the eFORWARD Server<sup>SM</sup> 12, eDIRECT™ may request a receive session in one of three modes: 1) Receive a single message, 2) Receive in Single Batch mode and discontinue the session, and 3) Receive in Batch mode and request server call back (eDIRECT stays in listening mode). In each case, eDIRECT™ may request that messages from all transmitting iBoxes<sup>SM</sup> (a.k.a., trading partners) addressed to a specific iBox<sup>SM</sup> be delivered or that messages only from a single specified trading partner be delivered." Col. 6, lines 34-43. "If a batch receive with server call back is requested then all waiting messages will be transmitted by the Server in order of their receipt and the eDIRECT IP address and call back port is recorded for instant delivery when/if subsequent message arrive for the specified iBox. The call back request must be refreshed every 'n' minutes or the server will discontinue honoring the call back request." Col. 6, lines 50-56.

As such, the *Persels* reference fails to disclose "retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote terminal computer of the user, the configuration file instructing the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file," as recited in claim 10. In contrast, *Persels* discloses that the eFORWARD server receives instructions from a receiving eDIRECT client to transmit to the eDIRECT client a waiting message intended for the receiving eDIRECT client. At the time of receiving the request from the eDIRECT client, the eDIRECT IP address and call back port is recorded for the eDIRECT IP client. These instructions

and information do not reside in a configuration file residing in a home directory, as described in claim 10.

Further, the Office Action contends that *Hashem* discloses “allowing transfer of said at least one file to the remote computer without necessitating the remote computer being logged on the terminating file transfer computer.” See page 8. This should be considered in the context that the remote terminal computer interacts with a terminating file transfer computer which interacts with an originating file transfer computer, as described in claim 10. Particularly, the originating file transfer computer transfers a file to the terminating file transfer computer which transfers the file to the remote terminal computer.

The Office Action states that *Hashem* automatically downloads a file to a destination user without requiring the destination user to login to the terminal file computer. See pages 8-9 of Office Action and col. 5, lines 25-55 of *Hashem*. In response, Assignee respectfully submits that *Hashem* is describing the transfer of a file to a “terminating file transfer computer” and not “a remote terminal computer.” The file being transferred is sent from an originating site or computer to a terminating site or computer, whereas the claim is reciting transfer of a file from a home directory of a terminating file transfer computer (which received the file from an originating file transfer computer) to a remote terminal computer of the user. Thus, this passage of *Hashem* fails to disclose or describe that a file is downloaded to a destination user, as suggested in the Office Action. For example, *Hashem* does not disclose the further act of transferring the file from either an internal inbox 52 or external inbox 87 to a destination user.

Therefore, *Hashem* fails to remedy the deficiencies of *Persels*. For at least the foregoing reasons, the proposed combination of *Persels* in view of *Hashem* fails to teach or suggest at least “retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote terminal computer of the user, the configuration file instructing the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file; and transmitting, via the agent, the at least one file responsive to the configuration file to the

remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer," as recited in claim 10. Accordingly, claim 10 is patentable over *Persels* in view of *Hashem*, and the rejection of claim 10 should be withdrawn.

d. Claims 11, 13-14, and 16-18

For at least the reasons given above, claim 10 is allowable over the cited art of record. Since claims 11, 14, and 16-18 depend from and include the features of claim 10 and recite additional features, claims 11, 14, and 16-18 are allowable as a matter of law over the cited art of record.

Claim 13 is canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to the claim is rendered moot. Assignee takes this action merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Assignee reserves the right to pursue the subject matter of the canceled claim in a continuing application, if Assignee so chooses, and does not intend to dedicate any of the canceled subject matter to the public.

e. Claim 19

Independent claim 19 recites:

A Connect:Direct file handling system, comprising:  
a terminating file transfer computer having a processor;  
an agent; and  
a configuration file;  
the terminating file transfer computer launching the agent upon receipt of a file transfer message, the file transfer message comprising a local username and at least one filename, and the agent directing the transfer of and storage of at least one file associated with the filename to a home directory of the terminating file transfer computer associated with the username, the agent reading the configuration file, and *transferring the at least one file from the home directory to a remote terminal computer specified by the configuration file without necessitating the remote terminal computer being logged on the terminating file computer, wherein the configuration file instructs the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file and to store a host name and a port number associated with the remote terminal computer.*

(Emphasis added).

Claim 19 is allowable for at least the reason that *Persels* in view of *Hashem* does not disclose, teach, or suggest at least “transferring the at least one file from the home directory to a remote terminal computer specified by the configuration file without necessitating the remote terminal computer being logged on the terminating file computer, wherein the configuration file instructs the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file and to store a host name and a port number associated with the remote terminal computer,” as emphasized above.

The Office Action contends that *Persels* discloses “a configuration file residing in the home directory of the terminating file transfer computer, (*Persels*-Column 7 Lines 10-20, ‘administrative [data] pertaining to iBox’) and operable to instruct an agent to, after saving the at least one file to the home directory, (*Persels*-Column 6 Lines 15-20, ‘the message is retained in the eFORWARD server database’) transfer said at least one file to a remote host.” Page 7 (Emphasis removed).

In response, Assignee notes that an eDIRECT client may request a receive session with an eFORWARD server. “While establishing a valid session with the eFORWARD Server<sup>SM</sup> 12, eDIRECT™ may request a receive session in one of three modes: 1) Receive a single message, 2) Receive in Single Batch mode and discontinue the session, and 3) Receive in Batch mode and request server call back (eDIRECT stays in listening mode). In each case, eDIRECT™ may request that messages from all transmitting iBoxes<sup>SM</sup> (a.k.a., trading partners) addressed to a specific iBox<sup>SM</sup> be delivered or that messages only from a single specified trading partner be delivered.” Col. 6, lines 34-43. “If a batch receive with server call back is requested then all waiting messages will be transmitted by the Server in order of their receipt and the eDIRECT IP address and call back port is recorded for instant delivery when/if subsequent message arrive for the specified iBox. The call back request must be refreshed every ‘n’ minutes or the server will discontinue honoring the call back request.” Col. 6, lines 50-56.

As such, the *Persels* reference fails to disclose “transferring the at least one file from the home directory to a remote terminal computer specified by the configuration file without necessitating the remote terminal computer being logged on the terminating file computer, wherein the configuration file instructs the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file and to store a host name and a port number associated with the remote terminal computer,” as recited in claim 19. In contrast, *Persels* discloses that the eFORWARD server receives instructions from a receiving eDIRECT client to transmit to the eDIRECT client a waiting message intended for the receiving eDIRECT client. At the time of receiving the request from the eDIRECT client, the eDIRECT IP address and call back port is recorded for the eDIRECT IP client. These instructions and information do not reside in a configuration file residing in a home directory, as described in claim 19.

Further, the Office Action contends that *Hashem* discloses “allowing transfer of said at least one file to the remote computer without necessitating the remote computer being logged on the terminating file transfer computer.” See page 8. This should be considered in the context that the remote terminal computer interacts with a terminating file transfer computer which interacts with an originating file transfer computer, as described in claim 19. Particularly, the originating file transfer computer transfers a file to the terminating file transfer computer which transfers the file to the remote terminal computer.

The Office Action states that *Hashem* automatically downloads a file to a destination user without requiring the destination user to login to the terminal file computer. See pages 8-9 of Office Action and col. 5, lines 25-55 of *Hashem*. In response, Assignee respectfully submits that *Hashem* is describing the transfer of a file to a “terminating file transfer computer” and not “a remote terminal computer.” The file being transferred is sent from an originating site or computer to a terminating site or computer, whereas the claim is reciting transfer of a file from a home directory of a terminating file transfer computer (which received the file from an originating file transfer computer) to a remote terminal computer of the user. Thus, this passage of *Hashem* fails to disclose or describe that a file is downloaded to a destination user, as suggested

in the Office Action. For example, *Hashem* does not disclose the further act of transferring the file from either an internal inbox 52 or external inbox 87 to a destination user.

Therefore, *Hashem* fails to remedy the deficiencies of *Persels*. For at least the foregoing reasons, the proposed combination of *Persels* in view of *Hashem* fails to teach or suggest at least “transferring the at least one file from the home directory to a remote terminal computer specified by the configuration file without necessitating the remote terminal computer being logged on the terminating file computer, wherein the configuration file instructs the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file and to store a host name and a port number associated with the remote terminal computer,” as recited in claim 19. Accordingly, claim 19 is patentable over *Persels* in view of *Hashem*, and the rejection of claim 19 should be withdrawn.

f. Claims 21-23

For at least the reasons given above, claim 19 is allowable over the cited art of record. Since claims 21-23 depend from and include the features of claim 19 and recite additional features, claims 21-23 are allowable as a matter of law over the cited art of record. Additionally, *Campbell* does not remedy the deficiencies of *Persels* in view of *Hashem* with respect to independent claim 19.

g. Claim 24

Independent claim 24 recites:

A computer diskette having a program for handling files on a computer, wherein the computer diskette is a physical structure executed by the computer and the program is operable to perform:

receiving a file transfer message from an originating file transfer computer at a terminating file transfer computer;

in response to receiving the file transfer message, executing an agent;

determining, by the agent, a home directory of the terminating file transfer computer from a user associated with the file transfer message;

storing at least one file associated with the file transfer message in

the home directory;

*retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote terminal computer of the user and instructions for the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file; and*

*transmitting, via the agent, the at least one file responsive to the configuration file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer.*

(Emphasis added).

Independent claim 24 is allowable for at least the reason that *Persels* in view of *Hashem* does not disclose, teach, or suggest at least "retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote terminal computer of the user and instructions for the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file; and transmitting, via the agent, the at least one file responsive to the configuration file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer," as emphasized above.

The Office Action contends that *Persels* discloses "a configuration file residing in the home directory of the terminating file transfer computer, (*Persels*-Column 7 Lines 10-20, 'administrative [data] pertaining to iBox') and operable to instruct an agent to, after saving the at least one file to the home directory, (*Persels*-Column 6 Lines 15-20, 'the message is retained in the eFORWARD server database') transfer said at least one file to a remote host." Page 7 (Emphasis removed).

In response, Assignee notes that an eDIRECT client may request a receive session with an eFORWARD server. "While establishing a valid session with the eFORWARD Server<sup>SM</sup> 12, eDIRECT<sup>TM</sup> may request a receive session in one of three modes: 1) Receive a single message, 2) Receive in Single Batch mode and discontinue the session, and 3) Receive in Batch mode and request server call back (eDIRECT

stays in listening mode). In each case, eDIRECT™ may request that messages from all transmitting iBoxes<sup>SM</sup> (a.k.a., trading partners) addressed to a specific iBox<sup>SM</sup> be delivered or that messages only from a single specified trading partner be delivered.” Col. 6, lines 34-43. “If a batch receive with server call back is requested then all waiting messages will be transmitted by the Server in order of their receipt and the eDIRECT IP address and call back port is recorded for instant delivery when/if subsequent message arrive for the specified iBox. The call back request must be refreshed every ‘n’ minutes or the server will discontinue honoring the call back request.” Col. 6, lines 50-56.

As such, the *Persels* reference fails to disclose “retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote terminal computer of the user and instructions for the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file; and transmitting, via the agent, the at least one file responsive to the configuration file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer,” as recited in claim 24. In contrast, *Persels* discloses that the eFORWARD server receives instructions from a receiving eDIRECT client to transmit to the eDIRECT client a waiting message intended for the receiving eDIRECT client. At the time of receiving the request from the eDIRECT client, the eDIRECT IP address and call back port is recorded for the eDIRECT IP client. These instructions and information do not reside in a configuration file residing in a home directory, as described in claim 24.

Further, the Office Action contends that *Hashem* discloses “allowing transfer of said at least one file to the remote computer without necessitating the remote computer being logged on the terminating file transfer computer.” See page 8. This should be considered in the context that the remote terminal computer interacts with a terminating file transfer computer which interacts with an originating file transfer computer, as described in claim 24. Particularly, the originating file transfer computer transfers a file to the terminating file transfer computer which transfers the file to the remote terminal computer.

The Office Action states that *Hashem* automatically downloads a file to a destination user without requiring the destination user to login to the terminal file computer. See pages 8-9 of Office Action and col. 5, lines 25-55 of *Hashem*. In response, Assignee respectfully submits that *Hashem* is describing the transfer of a file to a “terminating file transfer computer” and not “a remote terminal computer.” The file being transferred is sent from an originating site or computer to a terminating site or computer, whereas the claim is reciting transfer of a file from a home directory of a terminating file transfer computer (which received the file from an originating file transfer computer) to a remote terminal computer of the user. Thus, this passage of *Hashem* fails to disclose or describe that a file is downloaded to a destination user, as suggested in the Office Action. For example, *Hashem* does not disclose the further act of transferring the file from either an internal inbox 52 or external inbox 87 to a destination user.

Therefore, *Hashem* fails to remedy the deficiencies of *Persels*. For at least the foregoing reasons, the proposed combination of *Persels* in view of *Hashem* fails to teach or suggest at least “retrieving, by the agent, a configuration file from the home directory, wherein the configuration file comprises a host name and a port name of a remote terminal computer of the user and instructions for the agent to, after saving the at least one file to the home directory, transfer the at least one file from the home directory to the remote terminal computer specified in the configuration file; and transmitting, via the agent, the at least one file responsive to the configuration file to the remote terminal computer without necessitating the remote terminal computer being logged on the terminating file transfer computer,” as recited in claim 24. Accordingly, claim 24 is patentable over *Persels* in view of *Hashem*, and the rejection of claim 24 should be withdrawn.

h. Claims 25, 27, and 29-32

For at least the reasons given above, claim 24 is allowable over the cited art of record. Since claims 25 and 29-32 depend from and include the features of claim 24 and recite additional features, claims 25 and 29-32 are allowable as a matter of law over the cited art of record.

Claim 27 is canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to the claim is rendered moot. Assignee takes this action merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Assignee reserves the right to pursue the subject matter of the canceled claim in a continuing application, if Assignee so chooses, and does not intend to dedicate any of the canceled subject matter to the public.

### **CONCLUSION**

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well-known for at least the specific and particular reason that the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

For at least the reasons set forth above, all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. In addition, Assignee reserves the right to address any comments made in the Office Action that were not specifically addressed herein. Thus, such comments should not be deemed admitted by the Assignee. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

/Charles W. Griggers/  
**Charles W. Griggers, Reg. No. 47,283**

**AT&T Legal Department – TKHR**  
Attn: Patent Docketing  
One AT&T Way  
Room 2A-207  
Bedminster, NJ 07921  
Customer No.: **38823**